

Exhibit 23



Brian T. Ross
Partner
bross@gibbsbruns.com
713.751.5286

December 11, 2020

Via Email

Daniel V. Dorris
Kellogg, Hansen, Todd, Figel & Frederick, PLLC
1615 M Street, N.W., Ste. 400
Washington, D.C. 20036-3215

Re: *In re: Dealer Management System Antitrust Litigation*, C.A. No. 18-C-864, MDL No. 2817 (N.D. Ill.)

Dear Dan,

Enclosed please find a Supplemental Response to the FTC's CID provided to the agency today with respect to questions regarding the recent allegations against Bob Brockman. In addition, Reynolds will shortly be making a supplemental document production of materials identified in the course of the investigation that led to this Supplemental Response. Please note that the Supplemental Response and its appendices are designated "Highly Confidential – Attorney's Eyes Only" pursuant to the MDL Protective Order.¹

As described further in the response, Reynolds has not identified any additional sources of potentially relevant material for Mr. Brockman.

During the course of our review of our MDL discovery processes, we did identify one additional responsive email from Mr. Brockman's custodial collection (saved into a non-email folder) that due to an oversight was not produced. That email will be included in Reynolds's forthcoming supplemental production. Reynolds apologizes for the oversight and would agree not to oppose a request by MDL Plaintiffs to supplement the summary judgment record with that email.

We hope this response and supporting materials resolve the questions raised in your previous letters. Reynolds is willing to meet and confer regarding any outstanding issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian T. Ross".

Brian T. Ross

¹ Confidentiality designations for the forthcoming supplemental production will be done on a document-by-document basis, as with any other production.

Daniel V. Dorris
December 11, 2020
Page 2 of 2

Cc: MDL Service List